

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

**BRITTANEY BAILEY,
on behalf of herself and all others
similarly situated,**

Plaintiff,

vs.

CIVIL ACTION NO: 2:17-cv-77

**HOWBRO INVESTMENTS, LTD
D/B/A BUFFALO WILD WINGS;
BWWGP, INC.; KENDALL HOWARD;
LUBBOCK BWW MGMT, LLC;
WOLFFORTH WINGS, LTD D/B/A
BUFFALO WILD WINGS; HOW NO. 1,
INC.; LUBBOCK WILD WINGS, LTD
D/B/A BUFFALO WILD WINGS;
MIDLAND WINGS, LTD D/B/A BUFFALO
WILD WINGS; PERMIAN BWW
MGMT, LLC; ODESSA WINGS,
LTD D/B/A BUFFALO WILD WINGS;
AMARILLO WILD WINGS, LTD D/B/A
BUFFALO WILD WINGS; AMARILLO
BWW MANAGEMENT, LLC; and EAST
AMARILLO WINGS, LTD; D/B/A
BUFFALO WILD WINGS;**

Defendants.

**PLAINTIFF'S FEDERAL RULE OF CIVIL
PROCEDURE 26(a)(3) DISCLOSURES**

COMES NOW Plaintiff, Brittaney Bailey, individually and on behalf all opt-in plaintiffs, and in accordance with Federal Rule of Civil Procedure 26(a)(3), provides the following disclosures:

WITNESS LIST

PERSONS WITH KNOWLEDGE	ADDRESS AND TELEPHONE	SUBJECT OF INFORMATION	EXPECT TO PRESENT	MAY CALL
Brittaney Bailey	c/o Jeremi Young 1001 S. Harrison Suite 200 Amarillo, Texas 79101 (806) 331-1800	Plaintiff	X	
Martha Aguirre	c/o Jeremi Young 1001 S. Harrison Suite 200 Amarillo, Texas 79101 (806) 331-1800	Opt-In Plaintiff	X	
Chrissy Branscum	c/o Jeremi Young 1001 S. Harrison Suite 200 Amarillo, Texas 79101 (806) 331-1800	Opt-In Plaintiff	X	
Toni Burkholder	c/o Jeremi Young 1001 S. Harrison Suite 200 Amarillo, Texas 79101 (806) 331-1800	Opt-In Plaintiff	X	
Elizar Caldera	c/o Jeremi Young 1001 S. Harrison Suite 200 Amarillo, Texas 79101 (806) 331-1800	Opt-In Plaintiff	X	
Kaycie Darnell	c/o Jeremi Young 1001 S. Harrison Suite 200 Amarillo, Texas 79101 (806) 331-1800	Opt-In Plaintiff	X	
Veronica Fuentes	c/o Jeremi Young 1001 S. Harrison Suite 200 Amarillo, Texas 79101 (806) 331-1800	Opt-In Plaintiff	X	
Mandy Gage	c/o Jeremi Young 1001 S. Harrison Suite 200 Amarillo, Texas 79101 (806) 331-1800	Opt-In Plaintiff	X	
Christopher Gallegos	c/o Jeremi Young 1001 S. Harrison Suite 200 Amarillo, Texas 79101 (806) 331-1800	Opt-In Plaintiff	X	
Allison Greninger	c/o Jeremi Young 1001 S. Harrison Suite 200 Amarillo, Texas 79101 (806) 331-1800	Opt-In Plaintiff	X	
Jeremi K. Young	c/o Jeremi Young	Counsel for Plaintiff	X	

	1001 S. Harrison Suite 200 Amarillo, Texas 79101 (806) 331-1800			
Misty Meeker	c/o Robert Nebb Law Office of Michael Carper 1102 Main Street Lubbock, TX 79401 (806) 747-3016	Executive Vice President of Defendants	X	
Kendall Howard	c/o Robert Nebb Law Office of Michael Carper 1102 Main Street Lubbock, TX 79401 (806) 747-3016	Franchise Owner		X
Robert Nebb	Robert Nebb Law Office of Michael Carper 1102 Main Street Lubbock, TX 79401 (806) 747-3016	Counsel for Defendants	X	

In addition to the above, Plaintiff may call any of the other current opt-in plaintiffs in this action.

EXHIBIT LIST

Ex. No.	Document Description	Bates Number	Expect to Offer	May Offer
1.	Amarillo Wild Wings, Ltd Overtime Due on Tipped Employees May 1, 2015 through June 25, 2017		X	
2.	Amarillo Wild Wings, Ltd. Payroll Summary May 25, 2015 through May 25, 2017		X	
3.	Amarillo Wild Wings, Ltd. Transactions by Account as of June 25, 2017		X	
4.	Amarillo Wild Wings, Ltd. Wage Hour Repayment Reconciliation May 1, 2015 through June 25, 2017		X	
5.	East Amarillo Wings, Ltd Overtime Due on Tipped Employees May 1, 2015 through June 25, 2017		X	
6.	East Amarillo Wings, Ltd. Payroll Summary May 25, 2015 through May 10, 2017		X	
7.	East Amarillo Wings, Ltd. Transactions by Account as of June 25, 2017		X	
8.	East Amarillo Wings, Ltd. Wage Hour Repayment Reconciliation May 1, 2015 through June 25, 2017		X	
9.	Howbro Investments, Ltd. Overtime Due on Tipped Employees May 1, 2015 through June 10, 2017		X	
10.	Howbro Buffalo Wild Wings Payroll Summary May 25, 2015 through June 20, 2017		X	

11.	Howbro Buffalo Wild Wings Transactions by Account as of June 25, 2017		X	
12.	Howbro Investments, Ltd. Wage Hour Repayment Reconciliation May 1, 2015 through June 25, 2017		X	
13.	Lubbock Wild Wings, Ltd Overtime Due on Tipped Employees May 1, 2015 through June 25, 2017		X	
14.	Lubbock Wild Wings, Ltd. Payroll Summary May 25, 2015 through May 25, 2017		X	
15.	Lubbock Wild Wings, Ltd. Transactions by Account as of June 25, 2017		X	
16.	Lubbock Wild Wings, Ltd. Wage Hour Repayment Reconciliation May 1, 2015 through June 25, 2017		X	
17.	Wolfforth Wings, Ltd Overtime Due on Tipped Date of Inception through June 25, 2017		X	
18.	Wolfforth Wings, Ltd. Payroll Summary October 10, 2015 through May 25, 2017		X	
19.	Wolfforth Wings, Ltd. Transactions by Account as of June 25, 2017		X	
20.	Wolfforth Wings, Ltd. Wage Hour Repayment Reconciliation Date of Inception through June 25, 2017		X	
21.	Midland Wings, Ltd Overtime Due on Tipped May 1, 2015 through June 25, 2017		X	
22.	Midland Wings, Ltd. Payroll Summary May 25, 2015 through May 10, 2017		X	
23.	Midland Wings, Ltd. Transactions by Account as of June 25, 2017		X	
24.	Midland, Ltd. Wage Hour Repayment Reconciliation May 1, 2015 through June 25, 2017		X	
25.	Odessa Wings, Ltd Overtime Due on Tipped May 1, 2015 through June 25, 2017		X	
26.	Odessa Wings, Ltd. Payroll Summary June 1, 2015 through May 15, 2017		X	
27.	Odessa Wings, Ltd. Transactions by Account as of July 1, 2017		X	
28.	Odessa Wings, Ltd. Wage Hour Repayment Reconciliation May 1, 2015 through June 25, 2017		X	
29.	Brittaney Bailey Pay Stubs 2/16/17 through 2/28/17		X	
30.	Ex. 1 to Deposition of Misty Meeker-Notice of Intention to Take Oral Deposition of Designated Corporate Representative(s) of Howbro Investments, Ltd d/b/a Buffalo Wild Wings et al.		X	
31.	Ex. 2 to Deposition of Misty Meeker-Personnel File of Brittaney Bailey from Buffalo Wild Wings		X	
32.	Ex. 3 to Deposition of Misty Meeker-Photos of Employee Rights and Laws on wall at restaurants		X	
33.	Ex. 4 to Deposition of Misty Meeker-Buffalo Wild Wings International, Inc. Employee Orientation Handbook 2013		X	
34.	Ex. 5 to Deposition of Misty Meeker-Buffalo Wild		X	

	Wings International, Inc. Employee Orientation Handbook 2014			
35.	Ex. 6 to Deposition of Misty Meeker-Buffalo Wild Wings International, Inc. Employee Orientation Handbook 2015		X	
36.	Ex. 7 to Deposition of Misty Meeker-Buffalo Wild Wings International, Inc. Employee Orientation Handbook 2017		X	
37.	Ex. 8 to Deposition of Misty Meeker-Example of Tip Calculation Sheet		X	
38.	Ex. 9 to Deposition of Misty Meeker-East Amarillo Wings, Ltd Payroll Summary for Brittaney Bailey May 2014 through May 2017		X	
39.	Ex. 10 to Deposition of Misty Meeker-East Amarillo Wings, Ltd Brittaney Bailey Labor Spreadsheet 11/01/2016 through 3/31/2017		X	
40.	Ex. 11 to Deposition of Misty Meeker-Brittaney Bailey 2016 W-2		X	
41.	Ex. 12 to Deposition of Misty Meeker-Brittaney Bailey Server Sales Report 11/01/2016 through 3/30/2017		X	
42.	Ex. 13 to Deposition of Misty Meeker-Brittaney Bailey Labor Report 11/01/2016 through 3/31/2017		X	
43.	Ex. 14 to Deposition of Misty Meeker-Amarillo Wild Wings, Ltd. Payroll Summary May 25, 2015 through May 25, 2017		X	
44.	Exhibit 15 to Deposition of Misty Meeker-East Amarillo Wings, Ltd. Wage Hour Repayment Reconciliation May 1, 2005 through June 25, 2017		X	
45.	Exhibit 16 to Deposition of Misty Meeker-East Amarillo Wings, Ltd. Transactions by Account as of June 25, 2017		X	
46.	Exhibit 17 to Deposition of Misty Meeker-Buffalo Wild Wings Transactions by Account as of June 25, 2017		X	
47.	Exhibit 18 to Deposition of Misty Meeker-Wolfforth Wings Payroll Summary October 10, 2015 through May 25, 2017		X	

Plaintiff has discovery requests outstanding at the time these disclosures are made. Plaintiff reserves the right to supplement these disclosures upon receipt of additional discovery materials.

Respectfully submitted,

By: /s/ Jeremi K. Young
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State Bar No. 24013793
Collin Wynne
State Bar No. 24068815
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of February, 2018, the foregoing document was electronically transmitted to the Clerk of the Court for filing via the Court's ECF System, and service of Notice of Electronic Filing was made to the ECF registrants shown below:

Robert Nebb: rnebb@carperlaw.com

By: /s/ Jeremi K. Young
Jeremi K. Young